

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., et al.,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-11068 (JTD)
)
) (Jointly Administered)
)
)

**SUPPLEMENTAL DECLARATION OF KATE MAILLOUX IN SUPPORT OF THE
MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO,
AMONG OTHER THINGS, UTILIZE EPIQ CORPORATE RESTRUCTURING,
LLC AS INFORMATION AGENT, EFFECTIVE AS OF JANUARY 5, 2023**

I, Kate Mailloux, do hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Senior Director of Epiq Corporate Restructuring, LLC (“Epiq”), and I am authorized to make and submit this supplemental declaration (the “Declaration”) on behalf of Epiq. This Supplemental Declaration is submitted in support of the motion (the “Motion”)² [Docket No. 575] of the Official Committee of Unsecured Creditors (the “Committee”) of FTX Trading LTD and its affiliated debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned jointly administered chapter 11 cases (these “Chapter 11 Cases”) to, among other things, utilize Epiq as the Committee Information Agent. The statements contained herein are based upon personal knowledge.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification number is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. The disclosures set forth herein supplement my disclosures in the Motion to resolve certain inquiries presented by the United States Trustee for the District of Delaware (the “U.S. Trustee”). Moreover, the disclosures set forth in the Motion are incorporated herein by reference.

3. To clarify, Epiq is not providing any services to FTX Digital Markets Ltd. (“FTX DM”) in the Bahamas proceeding.

4. Epiq has also been retained as Committee Information Agent in *Voyager Digital Holdings, Inc.*, Case No. 22-10943 (MEW)(Bankr. S.D.N.Y.(Jul 05, 2022).

5. Epiq is a “disinterested person,” as that term is defined in section 101(14) of the Bankruptcy Code in that Epiq and its professional personnel:

- a. are not creditors, security holders, or insider of the Debtors;
- b. are not and were not, within two years before the date of the filing of these cases, directors, officers, or employees of the Debtors; and
- c. do not have an interest materially adverse to the interests of the Debtors’ estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors or for any other reason.

6. Epiq conducted a review, completed under my supervision, of the identified potential parties in interest (the “***Potential Parties in Interest***”) in the chapter 11 cases. The list of Potential Parties in Interest is the same list utilized by counsel to the committee of unsecured creditors. Epiq Corporate Restructuring, LLC is a member of Epiq Global, a worldwide provider of legal services, serving law firms, corporations, financial institutions and government agencies—helping them streamline the administration of business operations, class action and mass tort, court reporting, eDiscovery, regulatory, compliance, restructuring, and bankruptcy matters. To clarify, I have authorized the search across Epiq Global including the top level parent company DTI Topco, Inc., to its affiliates, including Epiq Corporate Restructuring, LLC. To the best of my knowledge,

and based solely upon information provided to me by counsel to the committee, neither Epiq, nor its affiliates and parents, have any connection to the Debtors. To the extent that Epiq's conflicts check has revealed that certain Potential Parties in Interest were connected to Epiq, these parties are disclosed on **Schedule 1** (the "***Client Match List***"). To the best of my knowledge, any such connections between Epiq and any parties on the Client Match List are completely unrelated to these Debtors.

7. Given Epiq's neutral position as the claims and noticing agent and by this application, the administrative agent in the Debtors' case, or any other cases, any Epiq personnel connections are not real or potential conflicts. From information ascertained after reasonable inquiry with the employees expected to spend time on these chapter 11 cases, (a) Epiq has no connection with the Debtors, including Samuel Bankman-Fried, Mr. Bankman-Fried's parents, Nishad Singh, Gary Wang, Caroline Ellison, Ryan Salame, or Ryne Miller; (b) Epiq personnel are not a creditor, equity security holder or insider of the Debtors; (c) no Epiq personnel is or was within two years of the Petition Date, a director, officer or employee of the Debtors; and (d) Epiq neither holds nor represents an interest materially adverse to the Debtors or its estate. To the best of my knowledge, neither Epiq nor any of its partners or employees hold or represent any interest adverse to the Debtors' estates. Based on the forgoing, I believe that Epiq is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code.

8. Epiq has agreed to a 20% discount on its standard hourly rates. This discount is already reflected in the pricing sheet annexed to the engagement letter.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: February 7, 2023
New York, New York

/s/ Kate Mailloux
Kate Mailloux

Schedule 1

Client Match List

ALIXPARTNERS, LLP
AMAZON
AMERICAN AIRLINES
AMTRAK
APPLE INC.
AT&T
AVIS
BANK OF AMERICA
BEST BUY
COMCAST
CONTINENTAL CASUALTY COMPANY
CVS
DELL INC
DELTA AIRLINES
DOOR DASH
ERNST & YOUNG
EXPEDIA
FACEBOOK/META
FEDEX
GAMESTOP
GODADDY
GOOGLE
HERTZ
HOTWIRE
HSBC BANK
IKEA
INSTACART
INTUIT INC
ISDA INC
JPMORGAN CHASE BANK, N.A.
LYFT
MARRIOTT
MCDONALDS
MICROSOFT
MORGAN STANLEY
NASDAQ, INC.
OFFICE DEPOT
PAYPAL
QBE INSURANCE CORPORATION

QUIZNOS
SENTRY
SOUTHWEST AIRLINES
SPOTIFY
STAPLES
STARBUCKS
TARGET
THE CONTAINER STORE
THE HARTFORD
TRAVELERS INSURANCE
TRIDENT
TWITTER
UBER
UNITED AIRLINES
UNITED HEALTHCARE
VERIZON WIRELESS
WELLS FARGO
YAHOO INC.
ZOOM